

BURSOR & FISHER, P.A.

Neal J. Deckant (State Bar No. 322946)
Julia K. Venditti (State Bar No. 332688)
1990 North California Boulevard, Suite 940
Walnut Creek, CA 94596
Telephone: (925) 300-4455
Facsimile: (925) 407-2700
Email: ndeckant@bursor.com
jvenditti@bursor.com

BURSOR & FISHER, P.A.

Frederick J. Klorczyk III (State Bar No. 320783)
888 Seventh Avenue
New York, NY 10019
Telephone: (925) 300-4455
Facsimile: (925) 407-2700
Email: fklorkczyk@bursor.com

Attorneys for Plaintiffs and the Putative Class

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

REBECCA KAPLAN, JOHN MURPHY,
JOHNNY PAPPAS, MICHAEL TISA, and
CHARLENE EGIZI, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

THE ATHLETIC MEDIA COMPANY,

Defendant.

Case No. 3:23-cv-00229-VC

**DECLARATION OF NEAL J.
DECKANT IN SUPPORT OF JOINT
STIPULATION TO SET A DEADLINE
FOR PLAINTIFFS TO AMEND AND A
BRIEFING SCHEDULE ON A
RESPONSIVE MOTION**

The Hon. Vince Chhabria

Date Action Filed: January 18, 2023

I, Neal J. Deckant, declare:

1. I am an attorney at law and am admitted to practice before this Court. I am a partner at Bursor & Fisher, L.P., counsel of record for Plaintiffs in this action. I have personal knowledge of the facts stated in this declaration. I make this declaration pursuant to Local Rule 6-2 in support of the parties' joint stipulation to set a deadline for Plaintiffs to amend their complaint, and to establish a briefing schedule on a responsive motion.

2. The parties are requesting the Court issue the orders set forth in the joint

stipulation to streamline the proceedings after Plaintiffs' forthcoming amended complaint.

3. After conferring, the parties are seeking to set a briefing schedule through the joint stipulation that will allow for additional time to brief an anticipated responsive motion directed to the forthcoming amended complaint. The potentially case-dispositive nature of the motion will necessitate additional briefing time for both sides beyond the deadlines set forth in the Local Rules.

4. Pursuant to Local Civil Rule 6-2(a)(2), the parties previously stipulated to extend The Athletic's time to answer, move, or otherwise respond to the original Complaint (Dkt. Nos. 11 and 16).

5. Pursuant to Local Civil Rule 6-2(a)(3), the instant stipulation would not affect the schedule for the case. The parties may seek to move the initial case management conference currently set for April 28, 2023, but will do so at a later time in compliance with the Local Rules and the Court's standing orders.

Pursuant to 28 U.S.C. § 1746 and the laws of California, I declare under penalty of perjury that the foregoing is true and correct. Executed on April 5, 2023 at Walnut Creek, California.

/s/ Neal J. Deckant

Neal J. Deckant